

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: TESTOSTERONE REPLACEMENT THERAPY PRODUCTS LIABILITY LITIGATION	MDL No. 2545
This Document Relates to All Cases	Master Docket Case No. 1:14-cv-01748 Hon. Judge Matthew F. Kennelly

**JOINT STATUS REPORT REGARDING
PROTECTIVE ORDER, PRESERVATION ORDER, AND ESI PROTOCOL**

The Court's July 10, 2014 order directed the parties to file this joint report regarding the status of the parties' discussions, agreements, and disagreements on a proposed protective order, preservation order, and ESI protocol. The parties met and conferred, made progress toward agreement on the orders, and intend to continue conferring, as follows:

Protective Order: Before the MDL, the parties agreed on most provisions for a proposed protective order, and briefed for the Court issues of disagreement. The Court heard oral argument and ruled on the areas of disagreement at a June 9, 2014 hearing. Since appointment of Plaintiffs' leadership, the parties have continued to confer on provisions for the proposed protective order. Several issues remain. The parties jointly request leave to file a proposed protective order, or competing submissions outlining the areas of dispute, on or before the next status hearing.

Preservation Order: Before the MDL, the parties agreed on most provisions for a proposed preservation order, and briefed for the Court issues of disagreement. The Court heard oral argument at June 9, 2014 hearing and requested additional information from Defendants. Defendants provided that information on July 7, 2014. The parties jointly request leave to file a proposed preservation order, or for Plaintiffs to file their responsive brief on the remaining disputed issues, on or before the next status hearing.

ESI Protocol: Before the MDL, the parties agreed on most provisions for an ESI protocol, and briefed for the Court issues of disagreement. The Court heard oral argument at a June 9, 2014 hearing and requested additional information from Defendants. Defendants provided that information on July 7, 2014. The parties jointly request leave to file a proposed ESI protocol, or for Plaintiffs to file their responsive brief on the remaining disputed issues, on or before the next status hearing.

Dated: August 18, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Marissa S. Ronk, hereby certify that on August 18, 2014, the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ Marissa S. Ronk